

HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

***IN RE SUBPOENA TO JIMMY NGUYEN***

IRA KLEIMAN, as the personal representative  
of the Estate of David Kleiman; and W&K Info  
Defense Research, LLC,

Plaintiffs,

v.

CRAIG WRIGHT,

Defendant.

CASE NO. 20-cv-00593-BJR

**NOTICE OF FILING *EXHIBIT A* TO  
DECLARATION OF NON-PARTY  
JIMMY NGUYEN IN SUPPORT OF  
RESPONSE TO PLAINTIFF'S  
SECOND MOTION TO COMPEL**

Non-Party Jimmy Nguyen gives notice of filing a copy of *Exhibit A* to his Declaration in Support of Response to Plaintiff's Second Motion to Compel [Dkt. No. 20] filed on May 6, 2020. The Declaration was inadvertently filed without the exhibit attached.

DATED this 7th day of May, 2020.

/s/ Scott B. Henrie

Scott B. Henrie, WSBA #12673  
WILLIAMS, KASTNER & GIBBS PLLC  
601 Union Street, Suite 4100  
Seattle, WA 98101-2380  
Telephone: (206) 628-6600  
E-mail: shenrie@williamskastner.com

NOTICE OF FILING *EXHIBIT A* TO DECLARATION OF  
NON-PARTY JIMMY NGUYEN IN SUPPORT OF  
RESPONSE TO PLAINTIFF'S SECOND MOTION TO COMPEL  
(USDC Case No. 20-cv-00593-BJR)

**Williams, Kastner & Gibbs PLLC**  
601 Union Street, Suite 4100  
Seattle, Washington 98101-2380  
(206) 628-6600

and

/s/ Spencer H. Silverglate  
Spencer H. Silverglate, FL Bar No. 769223  
*Pro Hac Vice Application Pending*  
Trevor Gillum, FL Bar No. 1003867  
*Pro Hac Vice Application Pending*  
CLARKE SILVERGLATE, P.A.  
799 Brickell Plaza, Suite 900  
Miami, FL 33131-2805  
Telephone: (305) 377-0700  
Email: ssilverglate@cspalaw.com; and  
tgillum@cspalaw.com

***Attorneys for James “Jimmy” Nguyen,  
Subpoenaed Individual***

**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on May 7, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to those registered with CM/ECF.

Further, I hereby certify that on May 7, 2020, I provided the foregoing to following non-CM/ECF participants via Electronic Mail/Email:

***Counsel for Plaintiffs:***

Emanuel Jacobowitz, WSBA #39991  
CLOUTIER ARNOLD JACOBOWITZ, PLLC  
2701 1st Ave., Ste. #200  
Seattle, WA 98121  
Telephone: 206-769-3759  
Email: manny@CAJlawyers.com

Velvel (Devin) Freedman, FL Bar No. 99762  
ROCHE CYRULNIK FREEDMAN LLP  
200 S. Biscayne Blvd, Suite 5500  
Miami, FL 33131  
Telephone: (305) 357-3861  
Email: vel@rcflfp.com; and  
nbermond@rcflfp.com

Kyle W. Roche and Joseph M. Delich  
ROCHE CYRULNIK FREEDMAN LLP  
99 Park Avenue, Suite 1910  
New York, NY 10016  
Email: kyle@rcflfp.com; and  
jdelich@rcflfp.com

Andrew S. Brenner  
BOIES SCHILLER FLEXNER LLP  
100 SE 2nd Street, Suite 2800  
Miami, FL 33131  
Email: abrenner@bsflfp.com

***Counsel for Defendant:***

Amanda McGovern  
Email: amcgovern@riveromestre.com

DATED this 7th day of May, 2020.

/s/ Scott B. Henrie

Scott B. Henrie, WSBA #12673  
WILLIAMS, KASTNER & GIBBS PLLC  
601 Union Street, Suite 4100  
Seattle, WA 98101-2380  
Telephone: (206) 628-6600 Fax: (206) 628-6611  
Email: shenrie@williamskastner.com

***Attorneys for James "Jimmy" Nguyen,  
Subpoenaed Individual***

# Exhibit A

----- Original Message -----

Subject: RE: Liaison/representative role on Kleiman lawsuit and other legal matters

From: <[craig@rcjbr.org](mailto:craig@rcjbr.org)>

Date: Fri, March 27, 2020 8:16 am

To: <[jimmy@newwindigital.com](mailto:jimmy@newwindigital.com)>

Yes Jimmy.

Please continue in this manner.

Craig Wright

**From:** [jimmy@newwindigital.com](mailto:jimmy@newwindigital.com) <[jimmy@newwindigital.com](mailto:jimmy@newwindigital.com)>

**Sent:** Friday, 27 March 2020 2:56 PM

**To:** [craig@rcjbr.org](mailto:craig@rcjbr.org)

**Subject:** Liaison/representative role on Kleiman lawsuit and other legal matters

Craig - this will confirm our telephone conversation of March 16, 2020. At your request, I will continue acting as your liaison/representative with your lawyers in the Kleiman lawsuit, in order to facilitate communications between you and the lawyers, as well as understanding of Bitcoin topics.

You first asked me in February 2018 to act in this liaison capacity to help find litigation counsel to represent you in the Kleiman lawsuit, and then after litigation counsel was selected, to continue facilitating communications with your counsel. This was in addition to the Common Interest Agreement we put in place between you and nChain at the beginning of the case.

Given my recent departure from nChain's Strategic Advisory Board, I asked you to confirm whether you still want me to act in this liaison/representative capacity on legal matters for you - including in the Kleiman case, and you said yes. I note that you also asked me in the past to serve in a similar representative/liaison role for you in other legal matters you have (in addition to the Kleiman lawsuit) and I will continue to do so.

As I've explained, I am no longer a practicing lawyer so I do not act as your counsel, but in a liaison role to assist you with your lawyers.